Tobacco Institute
Response to EPA Draft Risk Assessment
June 18, 1992

- The children's studies are not remotely adequate in controlling for the many so-called confounding factors that are capable of impairing the respiratory health of children. These include the frequency and quality of medical care, diet, cooking practices, cross-infection from siblings and the host of other factors relating to socioeconomic status.

  To suggest to parents that, because they smoke, they are contributors to childhood illness is cruel and is clearly designed to inject emotionalism into a scientific issue.

It would appear that the revised draft risk assessment demonstrates that EPA has chosen to ignore the troubling conclusions of Credible Science and the Expert Panel's recommendations for reform.

* Unfortunately, scare tactics would appear to have become business as usual at EPA. It would seem that smokers and tobacco farmers may join apple growers and the residents of Times Beach, MO as the latest victims of EPA policies.

* The references in the last paragraph are to:

1. A finding by the EPA that a chemical (alar) used on apples was hazardous to consumers. Millions of dollars in revenues to apple growers were lost as a result of this announcement. Later, EPA retracted its position on alar.

2. Residents of the town of Times Beach, Missouri were forced to leave their homes permanently because the EPA determined that there were dangerous levels of dioxin in the ground. Recently, EPA retracted its position on dioxin.

Source: https://www.industrydocuments.ucsf.edu/docs/qmwk0000